

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ALLIANZ GLOBAL INVESTORS GMBH et al.,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION et al.,

Defendants.

No. 1:18-cv-10364 (LGS)

**NOTICE OF DEFENDANTS' MOTION  
TO DISMISS THE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, defendants Bank of America Corporation, Bank of America, N.A., Barclays Bank PLC, Barclays PLC, Barclays Capital, Inc., BNP Paribas (identified in the SAC as "BNP Paribas Group" and "BNP Paribas S.A."), BNP Paribas USA, Inc., BNP Paribas Securities Corp., Citigroup, Inc., Citibank, N.A., Citigroup Global Markets, Inc., Credit Suisse AG, Credit Suisse International, Credit Suisse Securities (USA) LLC, Deutsche Bank AG, Deutsche Bank Securities Inc., The Goldman Sachs Group, Inc., Goldman Sachs & Co., LLC, HSBC Bank plc, HSBC North America Holdings, Inc., HSBC Bank USA, N.A., HSBC Securities (USA) Inc., J.P. Morgan Chase & Co., J.P. Morgan Chase Bank, N.A., J.P. Morgan Securities LLC, Merrill Lynch, Pierce, Fenner & Smith Inc., MUFG Bank, Ltd., MUFG Securities Americas Inc., Morgan Stanley, Morgan Stanley & Co., LLC, Morgan Stanley & Co. International PLC, NatWest Markets Securities Inc., RBC Capital Markets, LLC, Royal Bank of Canada, The Royal Bank of Scotland plc, SG Americas Securities, LLC, Société Générale, Standard Chartered Bank, UBS AG, and UBS Securities LLC will move this Court, before the Honorable Lorna G. Schofield,

on a date and at a time to be determined by the Court, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order dismissing the Second Amended Complaint in the above-referenced action in its entirety and with prejudice, in accordance with Rules 12(b)(1), 12(b)(3), and 12(b)(6) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's June 10, 2019 Order (ECF 220), Plaintiffs shall file any response to this motion no later than September 9, 2019, and Defendants shall file any reply in support of this motion no later than October 9, 2019.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument in connection with this motion to dismiss.

DATED: July 25, 2019

Respectfully submitted,

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<sup>1</sup> Allen & Overy LLP does not represent Defendants BNP Paribas BNP Paribas USA, Inc., and BNP Paribas Securities Corp. with respect to claims by Claimants affiliated with BlackRock, Inc.

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<sup>2</sup> Skadden, Arps, Slate, Meagher & Flom LLP does not represent JPMorgan Chase & Co., JPMorgan Chase Bank, N.A. and J.P. Morgan Securities LLC with respect to claims by

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<sup>3</sup> Linklaters LLP does not represent Société Générale or SG Americas Securities, LLC with respect to claims by BlackRock, Inc. or the BlackRock-related entities listed in Appendix C of the SAC.

<sup>4</sup> Eversheds Sutherland (US) LLP only represents Standard Chartered Bank with respect to claims by AllianzGI GmbH, the Allianz Entities, PIMCO, and the PIMCO Funds, all as defined in the SAC.